

Attorney Docket No.: US000339 (834-119)

REMARKS

Claims 1-14 are pending in the present application; all claims have been rejected.

The Examiner rejected Claims 1-7, 9 and 11-14 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,584,480 (Ferrel) and Claims 8 and 10 under 35 U.S.C. §103(a) as being unpatentable over *Ferrel*.

Ferrel describes an authoring environment for publishing content in a Multimedia Publishing Markup Language on-line. A story editor saves the content in a Multimedia Document Format (MDF) file.

The present invention provides a scalable parser that parses, or translates, XML code into data understood by an application's interface (API). The parser does not have the ability to translate the entire XML programming language, only those parts that are most useful. The inventive parser acts like a translator between the XML document and the API, but only with limited knowledge of the XML language. Limits on the knowledge are set by the computational power and memory capacity of the device on which the API resides. The limited knowledge may be increased or decreased, depending on need, making the parser scalable.

Claims 1 and 14 recite a method for processing information in a device by parsing a document. "Parsing", by definition, is the process of reading a source language, determining its structure, and producing intermediate code for it. Usually, this involves determining how a given statement in a language could be derived from the grammar of the language and producing a parse tree or other information about the statement as output. There is no "parsing" in Ferrel, only formatting.

The Examiner states "Ferrel discloses in Figure 18 a document processed for a particular device at reference sign 1056b, where the markup language grammar is designated for the particular device at reference sign 1054b." But in amended Claims 1 and 14, the subset, not the grammar, is designated for the processing device. The markup language grammar may be used on any device. In this case, XML is the markup language and it may

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be used on any XML-compliant device. It is the subset that is designated to a particular device, depending on the capabilities of the device. Ferrel does not disclose or suggest any such subset or designation. Ferrel only discusses visually formatting information, as stated in the document at device 1056b, "The style sheet can present the user with text that appears to be formatted in a particularly desirable way *without modifying the underlying text*. [emphasis added]" The present invention *parses* information, which by definition, *modifies* the information. Ferrel, therefore, does not "parse an extensible markup document" as recited in Claim 1.

Claim 13 recites a processing device operable to parse a document, in other words, a parser. A "parser" is a program that determines how a given statement in a language could be derived from the grammar of the language, producing a parse tree or other information about the statement as output. As there is no parsing in Ferrel, there can be no parser.

With regard to the Examiner's "Response to Arguments," the Examiner maintains that Ferrel discloses processing for designated devices. The amended claims do not recite processing for designated devices, but instead, parsing a document with a designated subset, the subset designated for the device on which the parsing occurs. The Examiner further quotes Ferrel as stating "... a content provider can create a title just once, but the title can be viewed on a VGA screen ... a printer ... a small screen ... PDA ... a fax machine, or a notebook computer. Different styles can be applied to each of these devices so that the displayed content is formatted properly." This quote further bolsters Applicant's position that Ferrel does not parse a document, but rather, merely formats the text contained in it.

Therefore, it is respectfully submitted that independent Claims 1, 13, and 14 are allowable. Without conceding the patentability per se of dependent Claims 2-12, they are likewise believed to be allowable by virtue of their dependence on Claim 1. Accordingly, reconsideration and withdrawal of the rejections and objections of Claims 1-14 are respectfully requested.

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In view of the preceding amendments and remarks, it is respectfully submitted that all pending claims, namely Claims 1-14 are in condition for allowance. Should the Examiner believe that a telephone conference or personal interview would facilitate resolution of any remaining matters, the Examiner may contact Applicants' attorney at the number given below.

Respectfully submitted,



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